

APPLICANT RESPONSES IN RED
10/23/20

September 2, 2020

Robert Rosa, Chair
ROCKLAND ZONING BOARD OF APPEALS
242 Union Street
Rockland, MA 02370

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Somerville, MA 02144
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RE: Shinglemill Apartments
Preliminary Architectural Peer Review Report

Clifford J. Boehmer, AIA
Ross A. Speer, AIA
Iric L. Rex, AIA

Dear Robert:

In accordance with my proposal to you dated July 1, 2020, I'm writing this letter to provide you with a preliminary report on the documents I've received related to the proposed Shinglemill Apartments on Pond Street in Rockland MA. I am anticipating that if requested, I will present these comments at the ZBA hearing scheduled for Tuesday, September 15. This report is organized to follow the various tasks outlined in my proposal.

1. **Review of the developer's application, plans and drawings, reports from other peer reviewers and Town officials, letters from neighboring residents, etc.**

Documents reviewed (comments on documents contained in Section 5 below):

- Plan set "Shinglemill Site Plans, 0 Pond Street..." dated October 29, 2019 (this set has been supplanted).
- Architectural plan set extracted from Application depicting original building forms (this set has also been supplanted).
- Schematic renderings A-1, A-2, A-3 and Clubhouse Schematic rendering dated September 17, 2019 (no longer current design of main residential buildings or clubhouse).
- Aerial photograph site plan and existing context views (supplanted scheme).
- Narrative Description of Design Approach extracted from Application. Most language not applicable to current scheme.
- Sustainable Development Criteria Scorecard extracted from Application.
- Drawing set "Shinglemills Multi-Family Development..." dated July 13, 2020 (presumably the current proposal). Set includes updated renderings of residential buildings and clubhouse.
- Drawing set "Shinglemill Apartments Comprehensive Permit Plans..." dated May 14, 2020.
- Aerial Map with current scheme superimposed, dated 7.21.20.
- Limited Summary of Environmental and Geotechnical Conditions memo to David Andronico prepared by Tighe & Bond dated July 30, 2020.
- Traffic Study Peer Review prepared for the Rockland ZBA by Gillon Associates dated July 27, 2020.
- Civil Engineering Peer Review prepared for the Rockland ZBA prepared by Amory Engineers, P.C., dated August 14, 2020 and June 10, 2020.

REFERENCE MATERIALS

- Handbook: Approach to Chapter 40B Design Reviews, prepared by The Cecil Group, Inc. for DHCD, MassDevelopment, MassHousig, and MHP, January 2011
- Excerpts from the Rockland Housing Production Plan, including USGS image, Flood Insurance Rate Map, and diagrams of Rockland Potential Development Sites, Flooding and Hazard Areas, Protected Water Sources, and Environmental Conservation and Protection Areas.
- Article from The Patriot Ledger "Shingle Mill development would bring 236-unit apartment complex to Rockland" dated July 28, 2020.

2. Initial Meeting at the site with the Developer's Design team and Representative of the Town

This reviewer has not had the opportunity to meet at the site with either the developer or any Town representative. However, a thorough "reconnaissance" has been conducted using Google Earth.

3. Conduct site visit and reconnaissance assessment of surrounding residential and nonresidential areas within 1/2 mile of the project site.

As noted above, the assessment has utilized Google Earth, as well as information related to the site excerpted from the Town's Housing Production Plan.

The site is a 28.64 acre, largely vegetated parcel south of the Hingham Street Home Depot, northwest of a small scale residential neighborhood of approximately 120 homes, east of a Doubletree Hilton, and due north of (although not directly abutting) the Rockland Abington Reservoir. A small area of the site was historically used as a junk yard, and reportedly, some debris remains on the site. To create a developable "podium", significant lineal footage of retaining walls would have to be constructed (ranging in height from six to fourteen feet), and something like 73,000 cubic yards of fill would be imported to distribute across all built areas (see geotechnical and civil reports for detailed information). After construction, according to the civil engineering drawings, of the total site area, there will be 2.81 acres of pavement and parking, and 1.37 acres of building area (note that the areas indicated on the cover sheet do not add up to the total acreage). The remainder of the site will remain wetlands, and presumably required buffer areas.

Within ½ mile of the site there is significant commercial development to the west, north, and northeast. Given the proposed circulation to the site by a single "causeway" built up off of the existing grade, or the pedestrian access through the emergency fire entry/egress through the abutting residential area, all access to the commercial uses is via Pond Street. As currently configured, there are no walkways (or bike lanes) on either side of Pond Street all the way from the proposed development driveway to where it intersects Hingham Road. The entire length of the west side of Ponds street is very tight up to a metal guard rail system that provides no space for walking except in the travel lane. Some of the east side affords a grassy strip that is wide enough in some spots that it could be used for walking. These facts, combined with the current project driveway design that does not include any sidewalks, makes the pedestrian experience on the route to Hingham Street unpleasant, potentially hazardous.

The development of small homes to the southeast of the site, that potentially could be accessed through the fire emergency gate, is a more attractive option for walking. This includes Curry Street, Wright Street, Wilson Street, Colby Street, Turner Road, and Old Country Way. These streets are connected off of Pond Street, which in this stretch appears to have a narrow, paved path immediately adjacent to the southbound travel lane, not defined by curbs, that serves as a pedestrian walkway. None of these side-streets appear to have sidewalks, which given the low density of homes, infrequent vehicular traffic, and the fact that they are all dead-end, does not present a major problem for pedestrians.

Where Pond Street intersects Hingham Street, directly across the way is a large Park and Ride lot, where reportedly buses can be boarded bound for Boston. Unfortunately, there does not appear to be a crosswalk in that location, which is consistent with the fact that there are no sidewalks or bike lanes towards the west on Hingham (with limited walkability once past the Home Depot), and very limited walkable paths to the east. In short, while there are a variety of retail and other commercial amenities, including some with employment opportunities within ½ mile of the site, practically speaking, access is only by car (or by bicycle on roads not set up for safe cycling).

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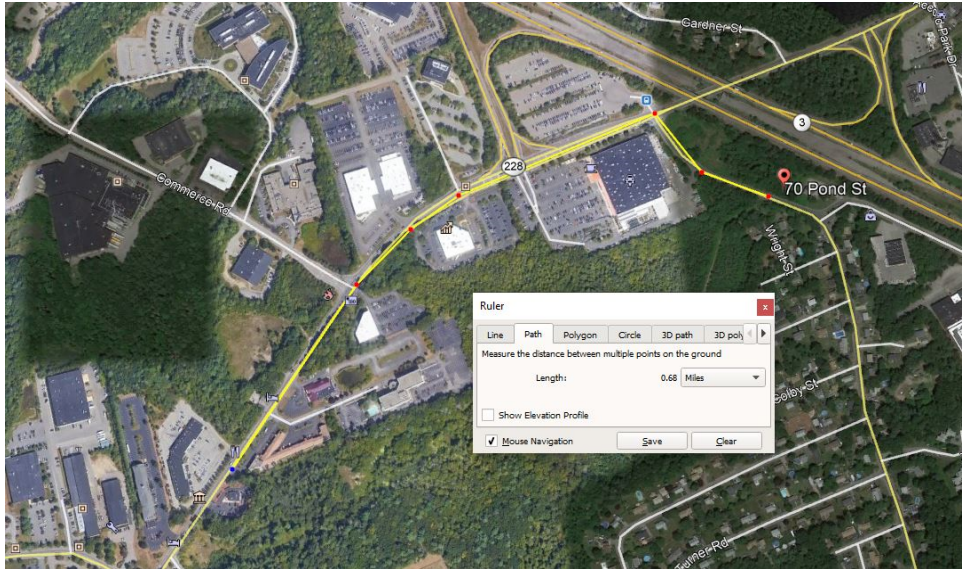
RESPONSE:

West of Site

Closest development other than Home Depot, Comfort Inn and Doubletree; is 0.68 Miles away

- Season's Café
- TKO Shea's Sports Café
- Dunkin's (may no longer be in operation)
- AAA
- Registry of Deeds
- Hair Salon
- Liquor store.

We would not consider this a "significant commercial development" or destination.



There are no sidewalks on this portion of Hingham St and it is a high traffic area that would be dangerous to pedestrian access. (see images below)



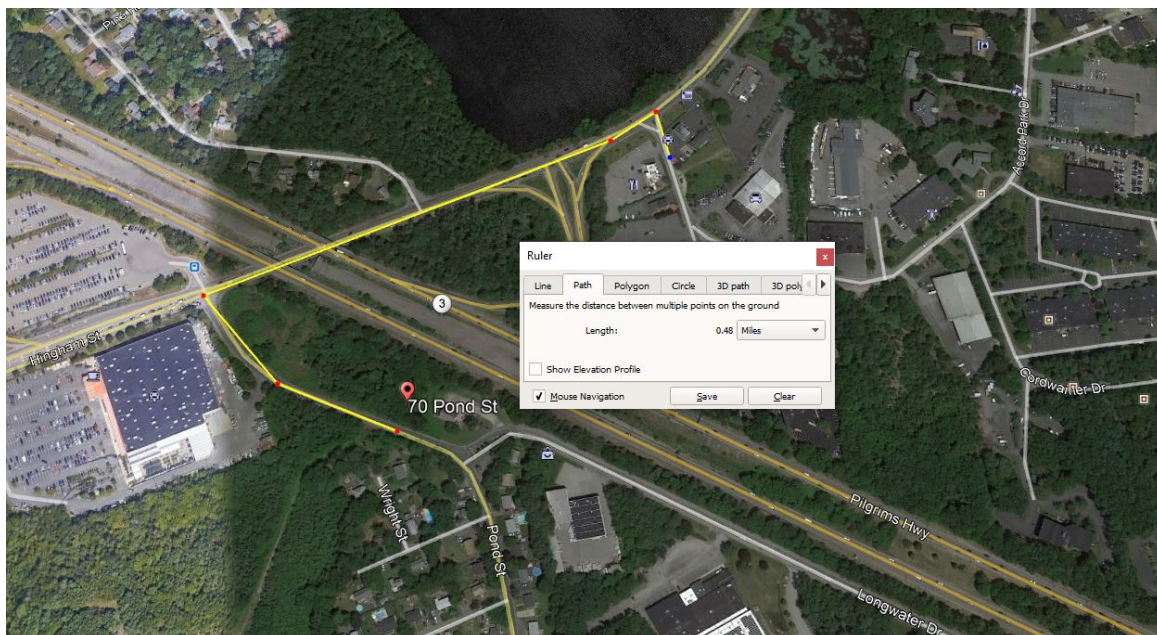
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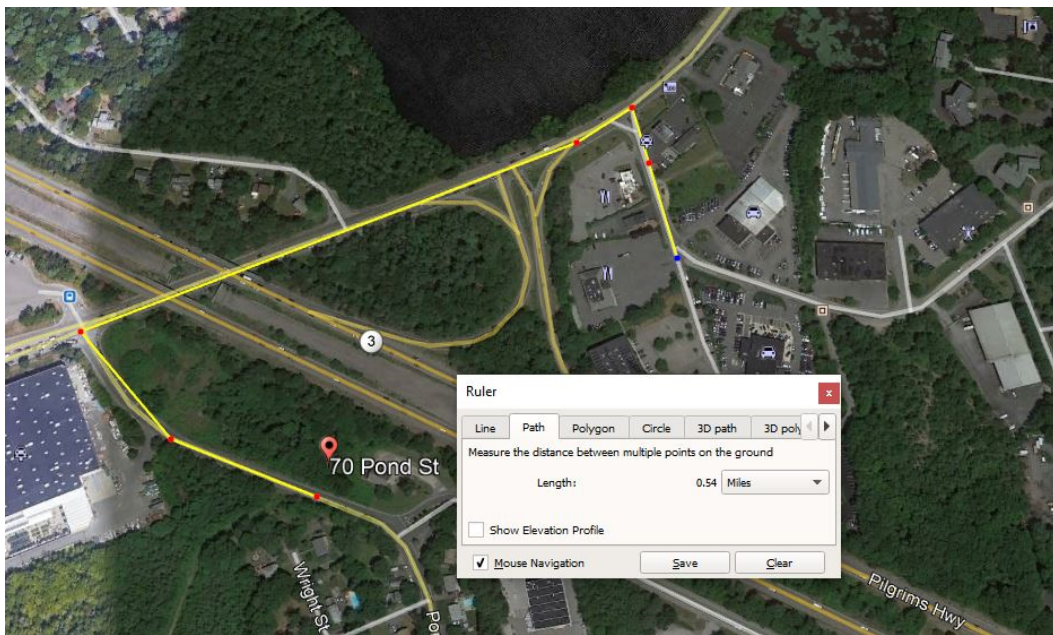
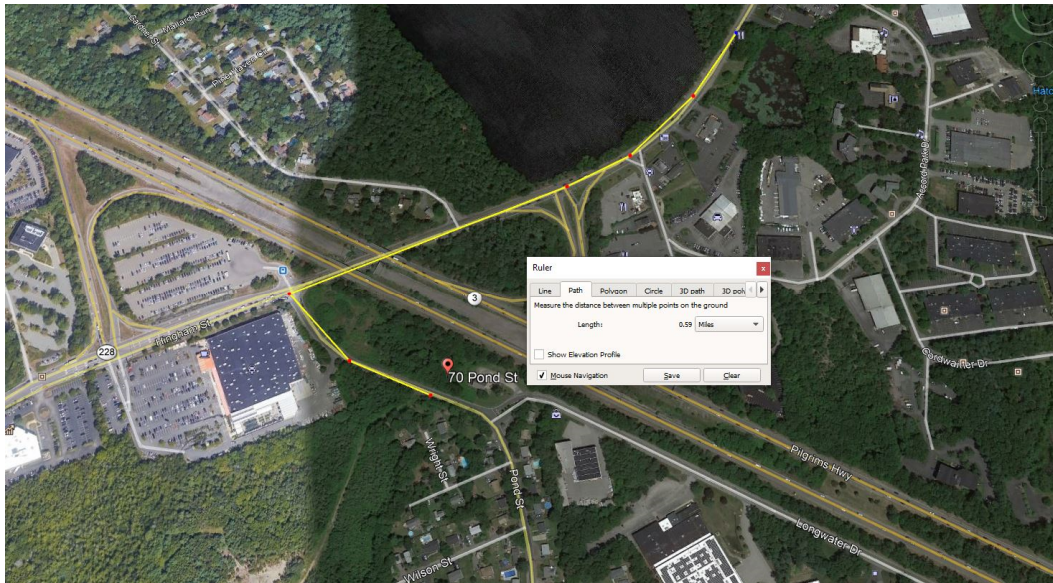
East of Site:

- Burger King – 0.48 miles
- 99 Restaurant - 0.54 miles (on Auto Mile)
- Not your Average Joes - 0.59 miles

We would not consider this a “significant commercial development” or destination.



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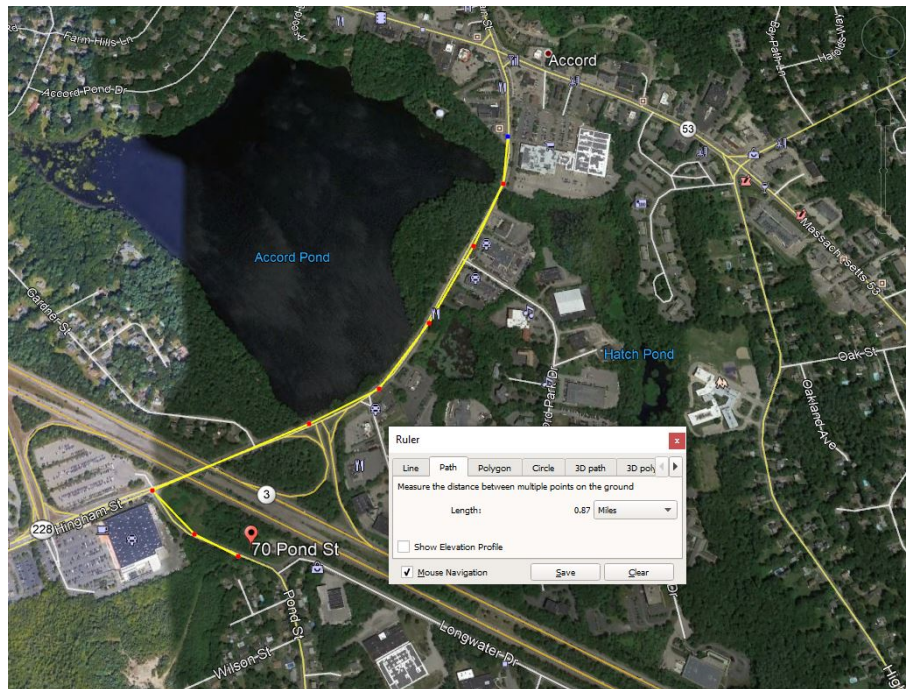
Again, there are no sidewalks on this portion of Hingham St. (see images below)



North East of Site:

- Home Goods and Big Y - 0.87 miles

We would not consider this a “significant commercial development” or destination. And again, there are no sidewalks on this portion of Hingham St.



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Other than a Burger King and Home Depot there are no commercial amenities within ½ mile. Auto miles are not considered amenities and would not require pedestrian access due to their automobile centric nature. All restaurants and grocery stores and very few retail establishments (Home Goods) are at a minimum 0.54-0.87 miles away along roads with no sidewalks. We also believe that it would be impractical for residents to carry goods home that were purchased at these establishments. Additionally, the purpose of a “Park and Ride” is to drive to the location, park, and ride. This should not be thought of as a bus stop.



4. Consult with the Applicant’s design team, as appropriate.

This peer reviewer has had no contact with the design team other than a request for some additional materials related to the application, including a copy of the Project Eligibility Letter and access to a 3-D computer model.

5. Provide an oral presentation to the ZBA. Said presentation typically includes comments and preliminary recommendations on the following:

Comments will likely be delivered to the ZBA on Tuesday, September 15th, 2020.

a. *Orientation of buildings in relation to parking areas, open space, and on-site amenities*

The proposed site is essentially an island in the middle of wetlands, accessed by a “causeway”, all defined by retaining walls that roughly follow wetland delineations and required setbacks. Within the bounds of the island there is virtually nothing but parking, building footprints, proposed fire access, a dog run, and space for an emergency generator.

The project proposes a total of 236 units in two buildings. One building (110 units) is a “bar” shape (366 feet long), and the other (126 units) is “L” shaped (335 feet X 155 feet measured on outside faces of the L). The “courtyard” space between the two is filled with five lanes of 90-degree car parking. The site area between the end of the bar, and the short end of the L is also filled with parking. Between the buildings and the parking there is a sidewalk that runs along the front ends of the parked cars, and there is a planted buffer that appears to be about five feet wide between the back of the sidewalk and the face of the building. This head-in parking arrangement, with headlights oriented to the building, occurs at five of the six elevations of the L building, and three of the four bar building elevations.

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Outdoor amenities appear to be limited to four six-foot benches within the parking lots near the primary building entries, an eight-foot by twelve-foot “pergola/café table and chair” near one of the emergency generators and transformer, a dog run (that appears to be fourteen feet below the entry level of the bar building), some outdoor trash receptacles, and a roughly circular “5’ bituminous walkway” that appears to come off of a switchback ramp structure at the southeast corner of the site (the ramp structure is necessary as the height of the retaining wall at that point appears to be about 11.8 feet).

There is a clubhouse on the eastern most part of the site, immediately adjacent to the emergency vehicular access to Wilson Street. An outdoor area behind the clubhouse is labeled “Outdoor clubhouse space, concrete patio and amenities.” The clubhouse floor plan is not annotated, but it appears to include a lounge area, a pool table, a kitchen area, bathrooms, office spaces, and what looks like a mail area within the entry vestibule.

The sidewalks within the development only serve as buffers along the edge of parking. There is a stamped concrete walkway that bridges between the bar building and L building sidewalks. There is also a proposed concrete walk that crossed from the L building to the clubhouse. There is no sidewalk that leads across the causeway out to Pond Street. The entry drive is designed to only accommodate vehicles, presumably to minimize its impact on the surrounding wetlands

RESPONSE:

We feel that to identify the project as “essentially an island in the middle of wetlands” is dismissive of the advantages of the location of this site. We believe that the wetlands provide natural views from the site and shields residents from traffic noise and views of buildings (such as the Home Depot). We have found in our experience managing over fifteen similar communities, that the privacy provided by wetlands is a desirable feature to prospective residents.

Regarding open space, the applicant will be proposing a revised plan which includes the following;

- Walking Path to the South of the development that is approximately 1,087 linear ft long
- Nature Observation Deck
- Open Park Space with seating area
- Half basketball court with seating area
- Dog run
- Outdoor Lounge behind club house with seating and fire pit

Regarding pedestrian access along the Pond Street Driveway, once at Pond Street and Hingham St there are no sidewalks. In fact, there is no form of pedestrian access for miles. A sidewalk from the site to Pond St would dead end into a busy street with no means of continuing by foot or safely by bicycle. (See below image)



b. Function, use and adequacy of open space and landscaped areas

For the scale of this development, the areas that are allotted for usable open space are seriously deficient. This deficiency is compounded by the fact that the site has very poor connectivity with any nearby usable outdoor space. The major on-site outdoor area is the parking lot between the two buildings, that as designed, has very few planted areas that could make it more pleasant for residents and provide some environmental benefits (less impervious surface, diminished heat island effect, etc.). The experience within the parking area would be very similar to parking between two 'big box' stores, made even less comfortable by the proposed height of the buildings (most big box stores are one-story, the proposed buildings are five-story). Much of the courtyard parking area will be in shadow for significant time of the day for most of the year, with the exception of mid-summer. There is no shadow study provided that depicts likely impact.

There is a landscaping plan included in the submitted materials. As noted above, there are minimal plantings proposed for the parking lots. There is also some effort at landscaping at the project entry area off of Pond Street. Along the primary facades of the two buildings the landscape plan is showing a tight, uniform pattern of shrubs planted in the 5-foot space between the sidewalk and building wall. This is likely an attempt to cut back on headlight intrusion into the ground floor units and potentially create some privacy. Unfortunately, it is not likely that landscaping in such a narrow strip will be very effective, resulting in those units keeping shades closed most of the time.

RESPONSE:

For response to open space concerns, please refer to the response to item 5a.

Regarding the shadowing of the site, based on the attached shadow study, it is evident that the buildings are far enough apart that there will not be significant shadow most of the day.

Regarding parking orientation and headlight intrusion, this condition can be seen at many other developments all over the country and at several of our existing communities. The applicant has explored the alternative underground parking and has concluded at a price tag of just under \$3 mil, the change would be economically infeasible.

c. Use and treatment of natural resources

The developed area is virtually 100% surrounded by wetlands. While outside the realm of this reviewer's expertise, the site is depicted on diagrams included in the Housing Production Plan that indicate potential flooding hazards, an activity and use limitation, inclusion in a protected water source area (as well as being located within wetlands, as noted in several locations in this review).

RESPONSE:

The proposed project is located outside the flood plain. In addition, the applicant previously responded to a review letter prepared by the Abington & Rockland Joint Water Works (ARJWW) dated July 30, 2020 which included comments regarding proximity to the wetlands and the water supply. See responses to ARJWW comments 1 & 2 included in the applicant's supplemental submission package dated September 4, 2020.

d. Building design, setbacks, massing and scale in relationship to the surrounding context and topography

The Narrative Description of Design Approach, while based on the more contemporary-looking original proposal, supports the notion of the building as a “destination”, as opposed to a development that is tied into the surrounding context. While there is an existing small-scale residential street that the development has frontage on, the only proposed connection is for emergency vehicles. This design approach is somewhat consistent with the nearby pattern of development as it applies to commercial uses (in the sense that it is a free-standing, “destination” project), although most of those existing nearby developments are not screened from their neighbors to the degree this one is (given that it is surrounded by a heavily vegetated wetland). To state is simply, rather than designing the buildings to fit in with neighboring development, residential or otherwise, the project is meant to be isolated from context.

RESPONSE:

The applicant does not agree that there is much in the surrounding area to be connected to. Once an occupant reaches Pond St there are no sidewalks and nothing notable to walk to for over ½ mile. To remedy this issue, the proposal contains many amenities within the site.

While this overall strategy could potentially support an argument that the new development minimizes impact to the surrounding community (at least from an architectural perspective, not necessarily from an environmental or traffic perspective), then the evaluation of the quality of design should be focused primarily on the perspective of the future residents and their visitors. To this end, the developer is proposing a number of amenities that are housed within the two buildings (as opposed to outdoor amenities, as there is no space provided on the site for those). Shared between the two buildings, the amenities include package rooms, office pods, pet spa, conference room, coffee space, cardio room, yoga/spin space, and a three-story climbing wall. Some of these appear to potentially encourage working “from home” from common areas within the buildings. There does not appear to be any area designated for bike storage for the residents, perhaps because as discussed above, the proximate town area is not bike friendly.

Regarding “in building amenities”, the applicant is proposing a significant amenities package which includes the following;

- Open and Private lounge/coffee areas
- Working Pods
- Theater
- 2 level Fitness Center with Yoga Studio
- Maker’s Space
- “Wiggle and Work” areas where kids can play while parents work
- Pet Spa
- Smart Package Rooms
- Clubhouse that offers dining, cooking, and lounge and entertainment areas
- Personal storage units (could be used for bike storage)

Regarding outdoor amenities, per the response to item 5a, the applicant will be proposing a revised plan which includes the following;

- Walking Path to the South of the development that is approximately 1,087 linear ft long
- Nature Observation Deck
- Open Park Space with seating area
- Half basketball court with seating area
- Dog run
- Outdoor Lounge behind club house with seating and fire pit

Regarding the buildings themselves, they are massive relative to any nearby residential context, including the Doubletree Hilton. Both buildings are a full five stories high, with a sloped portion of roof that brings the overall height close to 70 feet. Neither building has any meaningful articulation in the massing, and the buildings are very long (the longer of the two is 366 feet). While the windows are of a generous size, the fenestration pattern is uniform throughout the height of the building. It appears from the rendered elevations and perspective drawings that the means of breaking down the scale of the buildings is limited to color variation, some trim banding, and some gables that are perpendicular to the primary sloped roof plane. From a resident perspective, the large scale of the buildings is exacerbated by minimal setbacks from the sidewalks that define the parking lot.

RESPONSE:

The applicant is confident that the thoughtful use of color variations, changes in materials, and roof changes all create meaningful articulation of the façade of the buildings and creates an interesting and inviting aesthetic. The introduction of physical articulation by means of bump-outs in the façade would add considerable cost and complexity to the construction of the buildings, rendering the project economically infeasible.

To help understand the project's impact to the public realm, there is a rendering of the L-shaped building seen from the entry to the Home Depot parking lot. The visibility of the structure is enhanced by the fact that it is built on top of the earth podium discussed above. None of the views (including the building elevations) give a sense of what rooftop equipment will be visible.

RESPONSE:

The inclusion of the hybrid gable/bath-tub roof as represented in the renderings is intended to shield the rooftop equipment from view and provide a sound barrier for said equipment to reduce the impact on residents and neighbors.

Some of the development would also be visible from the end of Wilson Street, but no materials are provided that describe the impact from that location. There is also a birds-eye rendering of the building that is plugged into what is likely a Google Earth vista. This view underscores the isolating nature of the siting of this development.

RESPONSE:

As noted in the response to item 5a, we believe that the wetlands provide natural views from the site and shields residents from traffic noise and views of buildings (such as the Home Depot). We have found in our experience managing over fifteen similar communities, that the privacy provided by wetlands is a desirable feature to prospective residents.

e. Viewsheds of the project visible from the public street, public areas and from the vantage point of nearby residential neighborhoods

These points are discussed in the sections above.

f. Pedestrian and vehicular circulation, adequacy of accessibility provisions. Of particular interest are the implications of access and egress in terms of pedestrians, bicycles and motorists. Adequacy of parking facilities

As discussed above, other than by motor vehicles, access to the site is very limited. Determining the correct parking ratio for this development is beyond the scope of this review.

g. Integration of buildings and site, including but not limited to preservation of existing tree cover

Significant clearing of vegetation outside of designated wetlands buffers is required in order to create the site for this project. The site is more “carved out of” the existing site than integrated into the site. Tall retaining walls and the imported earth podium further separate the building site from the surrounding context.

h. Exterior materials

Façade materials are not called out on the building elevations. The Narrative Description of Design Approach states that “The façade makes use of a variety of high-quality contemporary materials organized in a way to convey overlapping scales.”

RESPONSE:

Although final materials have not yet been selected as the design focus has been driven by the immediate concerns of the town and applicant, the materials selected will provide texture with vertical and horizontal lap siding and neutral color variations.

i. Energy efficiency

It is not possible to ascertain from submitted materials.

j. Exterior lighting

Lighting plans are included in the submission that indicate both building mounted site lighting and pole-mounted fixtures within the parking areas and along the entry drive. It appears from the photometrics that there is minimal spill-over beyond the built-up areas of the site.

k. Proposed landscape elements, planting materials, and planting design

As discussed above, given the constraints imposed by large buildings on a small buildable area, the landscaping is not a notable design feature.

l. Feasibility of incorporating environmental and energy performance standards in the design, construction, and operation of the buildings

In any new construction, there are many opportunities for enhancing energy performance. Meeting current Massachusetts Building Code requirements go a long way towards responsible energy conservation. Several sustainable-related boxes are checked within the Sustainable Development Criteria Scorecard that was included in the application materials, including conformance with Energy Star standards. Also checked was “Uses renewable energy source, recycled and/or non-/low toxic materials, exceeds the state energy code, is configured to optimize solar access, and/or otherwise results in waste reduction and conservation of resources.” It will be important to monitor these commitments as the project’s design advances.

m. Any other design-related considerations identified by the consultant, ZBA, staff or working group

- Locations/types/plans of the required 12 Group 2 fully accessible units are not provided. Note that all units in elevator-fed buildings must at a minimum, be Group 1 units.

RESPONSE:

Group 2 Units will be designated as required.

- No spaces are allocated for bicycle parking.

RESPONSE:

Personal storage areas are available for bicycle parking.

- Is there a narrative describing how trash will be handled on the site?

RESPONSE:

Trash will be picked up multiple times per week from the designated trash rooms at each building.

- Has the developer drafted a Construction Management Plan that describes impact to the community and to the surrounding wetlands?

RESPONSE:

Please refer to the erosion control plans.

- The civil engineering peer review (August 14 revision) continues to have concerns related to the feasibility of constructing the plans as currently drawn, perhaps most importantly, the retaining walls.

RESPONSE:

A subsequent civil engineer peer review letter prepared by Amory Engineers dated September 22, 2020 has been provided to the applicant. Item 4 of this letter indicates that “As noted in our previous letters and discussed in the September 15, 2020 public hearing some of the proposed retaining walls are shown to be right along the wetland lines and care will need to be taken during construction to prevent disturbance to the wetlands.” The applicant concurs that care shall be taken for work along the wetlands.

- Rockland Fire Department has some issues with access to the site relative to turning radii.

RESPONSE:

Revised Site Plans included in a supplemental package submitted to the town on September 4, 2020 included updated Fire Truck turning movements.

n. Techniques to mitigate visual (and other) impacts

- As noted above, there is virtually no meaningful articulation that could help break down the scale of the building in order to make a more pleasant residential environment. This articulation must happen in plan and in section to have any impact given how long and tall the structures are.

RESPONSE:

As stated in the response to item “h”, we feel that material and color changes will break down the scale of the building. Paired with plantings all along the buildings and the lush wetlands surroundings, we will create an inviting atmosphere for future residents.

- If parking is going to be located close to buildings, and if the building scale is as currently depicted, the set back to the buildings must be significantly increased.

RESPONSE:

Increasing the setback would drastically reduce the amount of parking on site, which would contradict the towns expressed desire for additional parking.

- If parking needs to face the buildings, consideration should be given to raising the first-floor level off of grade.

RESPONSE:

Raising the first floor to accommodate podium parking would change the construction of the building by introducing podium (steel), which would be cost prohibitive. Additionally, it would create a scenario where we would either increase the height of the building, which is already a concern of the town, or eliminate a floor of the building which would also effect the economics of the project and significantly and reduce the number of affordable units being made available to the town.

- To open more site area to create outdoor amenity space, consider under building parking (that could also decrease the amount of fill that must be brought to the site).

RESPONSE:

Per the response to item 5b, the introduction of underground parking was considered but proved to be economically infeasible.

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I hope you will contact me to discuss this memo in detail, or to talk about issues that I have failed to cover. Looking forward to discussing this proposed development with you at a future ZBA hearing.

Thank you very much.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Clifford Boehmer', with a stylized, flowing script.

Clifford Boehmer,

SHINGLE MILL- SHADOW STUDY



DMS design
Architecture & Interior Design

5 Essex Green Drive Suite 11A
Peabody, MA 01960

2020-10-20

SUMMER SOLSTICE FALL EQUINOX WINTER SOLSTICE SPRING EQUINOX

MORNING

MID-DAY

AFTERNOON

